

**GIDEON KRACOV**

Attorney at Law

801 South Grand Avenue  
11th Floor  
Los Angeles, California 90017

(213) 629-2071  
Fax: (213) 623-7755

gk@gideonlaw.net  
www.gideonlaw.net

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**VIA WEBSITE PORTAL & EMAIL**

Regional Freedom of Information Officer  
U.S. EPA, Region 9  
75 Hawthorne Street (OPA-2)  
San Francisco, CA 94105

<https://foiaonline.regulations.gov/foia/action/public/request/createRequest>

Director Kelly Zito  
Office of Public Affairs, U.S. EPA Region 9  
[zito.kelly@epa.gov](mailto:zito.kelly@epa.gov)

**Re: Public Records Act Request – Universal Molding Company Facilities**

Dear Ms. Zito and FOIA Officer:

On behalf of the Los Angeles Waterkeepers ("Waterkeepers"), this Office requests under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 *et seq.*, inspection of records and documents that refer or relate to several industrial facilities owned and/or operated by Universal Molding Company or doing business under alternative names (collectively "Universal" or "Operator"), which is in possession of the United States Environmental Protection Agency, including but not limited all agents, employees, and sub-departments such as Region 9 divisions (*e.g.* Water, , Enforcement Divisions, etc.) (collectively "EPA") and held in either its headquarters, regional or field offices.

**I. Description of Records Sought**

All records sought related to facilities registered with the California State Water Resources Control Board under the following Waste Discharger Identification ("WDID") numbers and locations:

- Industrial facility WDID #419I014397, located at 10807-10890 Stanford Ave. in Lynwood, CA 90262, doing business or register as Universal Molding Company, Inc. ("Stanford Facility");
- Industrial facility WDID # 419I026222, located at 10840-10850 Drury Lane in Lynwood, CA 90262, doing business or register as Universal Molding Company, Inc. ("Drury Facility");
- Industrial facility WDID # 419I023611, located at 14912 S. Broadway in Gardena, CA 90248, doing business or register as North Star Acquisition ("Gardena Facility"); and



- Industrial facility WDID # 419I013881, located at 9151 E. Imperial Highway in Downey, CA 90242, doing business or registered as Universal Molding Extrusion Company (“Downey Facility”) (collectively “Facilities”)

The following documents are sought under this FOIA request:

- Any and all applications, permits, inspections, invoices, plans, correspondence, payments, e-mails, reports, tests, or other communications from January 17, 2012, through the present that refer or relate to the Facilities and/or Operator. In particular, this request seeks all documents of any type relating to stormwater/wastewater activities at the Facility, including stormwater treatment or discharge, Clean Water Act (“CWA”) compliance, wastewater discharges, and any other stormwater/wastewater related activities falling under the EPA’s oversight.

## II. Request For A Fee Waiver

Pursuant to EPA’s FOIA regulations, Waterkeepers requests a waiver of all search, duplication, review, and other direct costs for the following reasons:

1. The records are of public interest because it (i) *concerns the operations and activities* of EPA’s oversight and enforcement of CWA regulations; (ii) *likely contribute to an increased public understanding* given the records are directly related to said activities and not already disclosed; (iii) as a non-profit organization dedicated to the preservation, protection, and defense of the inland/coastal surface and groundwater of county of Los Angeles, California, Waterkeepers has unique *expertise in the subject area and ability to effectively convey information to the public*; and (iv) the public understanding of this specific Operator and Facilities would *be enhanced by the disclosure of records*. See 40 C.F.R. § 2.107(l)(2)(i)-(iv).
2. There is no commercial interest in disclosure of said records because Waterkeepers is (i) a non-profit organization lacking any *commercial, trade, or profit interests*; (ii), not a *data broker*; and therefore (iii) any perceivable *commercial interest is outweighed by the substantial public interest* served by disclosing said records. *Id.*, subds. (b)(1) & (l)(3).

For these reasons, Waterkeepers is entitled to a waiver of all fees in connection with this request. See 5 U.S.C. § 552(a)(4)(A)(iii). Nevertheless, in order to expedite a response, this Office *assures payment*, if necessary and under protest, in accordance with the FOIA regulations for all requested records. See 32 C.F.R. § 2.107(l)(6). Please contact this Office before doing anything that would cause fees to exceed \$250. Waterkeepers reserves its rights to seek administrative or judicial review of any fee waiver denial.

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### III. Conclusion

To reiterate, this request only seeks documents dated January 17, 2012 to the present. If you have any questions, clarifications, or determine requested document are publicly available, please contact me or my law clerk Jordan Sisson (213-69-2071 ext. 295, [jordan@gideonlaw.net](mailto:jordan@gideonlaw.net)). Thank you in advance for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gideon Kracov".

Gideon Kracov  
LAW OFFICE OF GIDEON KRACOV

CC: **U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9**  
Director Kathleen H. Johnson, Enforcement Division ([johnson.kathleen@epa.gov](mailto:johnson.kathleen@epa.gov))  
Sylvia Quast, Office of Regional Counsel ([quast.sylvia@epa.gov](mailto:quast.sylvia@epa.gov))  
Director Tomas Torres, Water Division ([torres.tomas@epa.gov](mailto:torres.tomas@epa.gov))